

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACOB WILKINS,

Defendant.

4:23CR3084

INDICTMENT  
29 U.S.C. § 501(c)  
29 U.S.C. § 439(b)

The Grand Jury charges that

COUNT I

Between on or about July 25, 2016, and on or about August 12, 2021 in the District of Nebraska, the defendant, JACOB WILKINS, while an officer, that is, President, of the National Association of Letter Carriers (NALC) Branch 1836, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to his own use, and the use of another, the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$23,698.21.

In violation of Title 29, United States Code, Section 501(c).

COUNT II

At all times material to this Indictment National Association of Letter Carriers, Branch 1836, (NALC) was a labor organization engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, et seq.

That between on or about January 1, 2018, and September 10, 2019, in the District of Nebraska, the defendant, JACOB WILKINS, did willfully conceal, withhold, or destroy a record required to be kept by Section 436 of Title 29, United States Code, that is, bank statements, check images, withdrawal slips, invoices, and receipts, which are records on matters required to

be reported in the annual financial report of NALC which was required to be filed with the Secretary of Labor for such labor organization's fiscal year ending on December 31, 2018.

All in violation of Title 29, United States Code, Section 439(c).

COUNT III

At all times material to this Indictment National Association of Letter Carriers, Branch 1836, (NALC) was a labor organization engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, et seq.

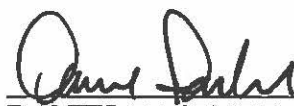
That between on or about January 1, 2019, and March 31, 2020, in the District of Nebraska, the defendant, JACOB WILKINS, did willfully conceal, withhold, or destroy a record required to be kept by Section 436 of Title 29, United States Code, that is, bank statements, check images, withdrawal slips, invoices, and receipts, which are records on matters required to be reported in the annual financial report of NALC which was required to be filed with the Secretary of Labor for such labor organization's fiscal year ending on December 31, 2019.

All in violation of Title 29, United States Code, Section 439(c).

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

  
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DANIEL PACKARD, #21991  
Assistant U.S. Attorney